

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HIGROUND CO., LTD. and
HIGROUND PTE. LTD.,

Plaintiffs,

Case No.: 1:23-cv-08618-JSR

-against-

**AFFIDAVIT IN SUPPORT OF
REQUEST FOR CERTIFICATE
OF DEFAULT**

HENRY HAN-WOONG LEE,
GENESIS DIGITAL ASSETS PTE. LTD.,
GENESIS GROUP PARTNERS, LLC,
NEON PARTNERS, LLC,
NEON PARTNERS LLC, and
GENESIS-NEON GROUP, LLC,
Defendants.

I, Bong June Kim, hereby declare as follows:

1. I am an attorney at Kim & Bae, P.C., the law firm representing Plaintiffs Higround Co., Ltd. and Higround Pte. Ltd. in this action.
2. Defendants Genesis Group Partners, LLC, Neon Partners, LLC, Neon Partners LLC, and Genesis-Neon Group, LLC (“Defendants”) are not infants, in the military, or incompetent persons.
3. Plaintiffs properly served copies of the Amended Summons and Complaint on each of the Defendants [ECF 43–46].
4. Defendants have failed to appear or to otherwise defend this action.

WHEREFORE, Plaintiffs request that the default of Defendants be noted and a certificate of default issued.

Dated: January 28, 2024

By: /s/ Bong June Kim
Kim & Bae, P.C.
2160 North Central Road, Suite 303
Fort Lee, NJ 07024
Tel: (201) 585-2288
Attorneys for Plaintiffs